

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALEXANDER NORRIS,

Plaintiffs,

V.

Marc Goldner, Individually and as Officer of :
GOLDEN BELL ENTERTAINMENT, LLC, a :
California company and GOLDEN BELL :
STUDIOS, LLC, a California Company, :

Defendants,

Civil Action No. 1:19-CV-05491 - PAE

AFFIDAVIT OF MARC GOLDNER

I, Marc Goldner., declare as follows:

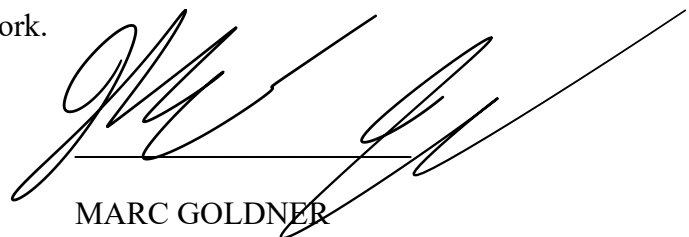
1. I am over the age of eighteen and a Defendant in this case. I am also a member and co-founder of Defendants Golden Bell Entertainment, LLC and Golden Bell Studios, LLC. I make this declaration in response to the Court's Order included in Dkt. No. 98 of the above referenced matter. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I make this declaration in response to the Court's Order to Show Cause regarding materials received from Plaintiff on July 13, 2022. I believed the materials were obtained pursuant to the contact at issue in this matter and as such my company, Defendant Golden Bell Entertainment, LLC was entitled to use the files as dictated by the Agreement.

3. In light of the Court's Order, I have been counseled by my attorneys at Gerard Fox Law, PC to destroy all files and materials as well as any copies received from Mr. Norris or his counsel on July 13, 2022. I have also been instructed to destroy any derivative work created from any of the files or materials received on July 13, 2022.

4. As of today, we have deleted everything we received from Mr. Norris or his counsel on July 13, 2022. Further, we do not have any copies or derivative works created from the files or materials received on July 13, 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of August 2022 at New York, New York.



MARC GOLDNER